P. 04

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Attorney's Docket No: ALC 3096

REJECTIONS UNDER 35 U.S.C. § 102

In section 1 on pages 3-4, the Office Action rejects claim 1 under 35 U.S.C. § 102(e) as

allegedly being unpatentable over U.S. Patent No. 7,017,051 to Patrick (hereinafter "Patrick").

Applicant respectfully traverses this rejection.

Independent claim 1 recites "mapping said authentication modules to authenticating

domain identifiers associated to end-user clients of said authentication server . . . wherein said

authenticating domain identifiers each comprise an application service identifier" (emphasis

added)." This subject matter relates to defining a direct mapping on the authentication server to

map an application ID with a list of software modules. Thus, as shown on pages 5-6, the

RADIUS and OS modules would map to a first application identifier, Application1, while the

SMARTCARD, OS, and KERBEROS modules would map to a second application identifier,

Application2. This mapping step must occur before the client is authenticated.

As further recited in paragraph [0021], if the entry is mapped to a local authentication

module, the authentication process is performed locally. Otherwise, the authentication server

triggers a remote authentication module. Again, this mapping step must occur before the client

is authenticated.

Applicant respectfully submits that Patrick fails to disclose, teach, or suggest the above-

quoted subject matter recited in claim 1. On page 2, the Office Action alleges that a subject can

refer to a user (be it an individual user or a group) or a service/process, referring to lines 62-63 of

column 2 in Patrick. On page 3, the Office Action further alleges that different types of proof

(e.g., user name, password, biometric data) may be required for authentication, referring to lines

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PAGE 4/9 * RCVD AT 3/17/2008 4:20:05 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-6/26 * DNIS:2738300 * CSID:703 5199802 * DURATION (mm-ss):01-52

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5-6 of column 3 in Patrick. Applicant respectfully submits that these sections of Patrick, and Patrick taken as a whole, fail to disclose, teach, or suggest the above-quoted subject matter.

Patrick's method does not disclose a mapping step. As recited in lines 32-33 of column 3, Patrick's method associates one or more principals with the subject upon successful authentication. This association of principals with a subject is not analogous to the recited step of mapping authentication modules to authenticating domain identifiers because relevant principals are associated with a subject only if the required login modules succeed in authentication, as recited on lines 38-41 of column 3. Thus, Patrick clearly does not map modules to identifiers prior to authentication.

Accordingly, Patrick does not disclose, teach, or suggest "mapping said authentication modules to authenticating domain identifiers associated to end-user clients of said authentication server . . . wherein said authenticating domain identifiers each comprises an application service identifier," as recited in claim 1 (emphasis added). For at least the forgoing reasons, Applicant respectfully requests that the rejection of claim 1 under 35 U.S.C. § 102 be withdrawn.

In section 3 on pages 4-5, the Office Action rejects claims 7, 10, and 11 under 35 U.S.C. § 102(a) and (e) as allegedly being unpatentable over U.S. Patent Publication No. 2003/0012382 to Ferchichi (hereinafter "Ferchichi"). Applicant respectfully traverses this rejection.

Independent claim 7 recites "means . . . for sending an authenticating domain identifier to an authentication server, wherein said authenticating domain identifier comprises an application service identifier" (emphasis added). As recited in paragraph [0018], a client sends a message including an authentication domain ID to an authentication server. As further recited in

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paragraph [0020], this authentication domain ID is an application service identifier. The authentication service then builds a stack according to the configuration defined by the specific ID, requiring a direct mapping of software modules to application IDs.

Applicant respectfully submits that Ferchichi fails to disclose, teach, or suggest the above-quoted subject matter. On page 4, the Office Action alleges that Ferchichi provides an authenticating domain identifier and application service identifier in paragraphs [0012] – [0015]. However, the Office Action fails to identify either identifier.

Ferchichi, as recited in paragraph [0048] has a single sign-on module. While this single sign-on module can be realized as a software module, Ferchichi does not provide a plurality of software modules. Thus, because Ferchichi has only one module, Ferchichi cannot use an application service identifier to distinguish between application IDs that use different sets of software modules. Moreover, as recited in paragraph [0019], Ferchichi's user enters one and only one password, regardless of the number of communication layers to be built up. Thus, Ferchichi is unable to use different application services for authentication and therefore does not include an application service identifier.

Accordingly, Ferchichi does not disclose, teach, or suggest "means for sending an authenticating domain identifier to an authentication server, wherein said authenticating domain identifier comprises an application service identifier," as recited in claim 7.

Applicant respectfully submits that claims 10 and 11 are allowable based at least on their dependence from claim 7 for the reasons stated above in connection with claim 7. For at least

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the forgoing reasons, Applicant respectfully requests that the rejection of claims 7, 10, and 11 under 35 U.S.C. § 102 be withdrawn.

REJECTIONS UNDER 35 U.S.C. § 103

In section 7 on pages 5-6, the Office Action rejects claims 4 and 5 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Patrick in view of Ferchichi. Applicant respectfully traverses this rejection.

Applicant respectfully submits that claims 4 and 5 are allowable based at least on their dependence from claim 1 for the reasons stated above in connection with claim 1. Ferchichi fails to overcome the deficiencies in Patrick described above. For at least the forgoing reasons, Applicant respectfully requests that the rejection of claims 4-5 under 35 U.S.C. § 103 be withdrawn.

In section 8 on pages 6, the Office Action rejects claim 6 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Patrick in view of U.S. Patent No. 6,587,880 to Saigo (hereinafter "Saigo"). Applicant respectfully traverses this rejection.

Applicant respectfully submits that claim 6 is allowable based at least on its dependence from claim 1 for the reasons stated above in connection with claim 1. Saigo fails to overcome the deficiencies in Saigo described above. For at least the forgoing reasons, Applicant respectfully requests that the rejection of claim 6 under 35 U.S.C. § 103 be withdrawn.

In section 9 on pages 6-7, the Office Action rejects claims 9 and 12 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ferchichi in view of U.S. Patent Publication No.

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2003/0154373 to Shimada (hereinafter "Shimada"). Applicant respectfully traverses this rejection.

Applicant respectfully submits that claims 9 and 12 are allowable based at least on their dependence from claim 7 for the reasons stated above in connection with claim 7. Shimada fails to overcome the deficiencies in Ferchichi described above. For at least the forgoing reasons, Applicant respectfully requests that the rejection of claims 9 and 12 under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

In light of the foregoing, withdrawal of the rejections of record and allowance of this application are earnestly solicited.

While we believe that the instant request places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner contact the correspondence attorney listed below at the telephone number listed below in order to expeditiously resolve any outstanding issues.

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In the event that the fees submitted prove to be insufficient in connection with the filing of this paper, please charge our Deposit Account Number 50-0578 and please credit any excess fees to such Deposit Account.

Respectfully submitted, KRAMER & AMADO, P.C.

Date: March 17, 2008

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